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1
       IN THE UNITED STATES DISTRICT COURT
2
        FOR THE EASTERN DISTRICT OF OHIO
3
                EASTERN DIVISION
5
    IN RE: NATIONAL : MDL NO. 2804
    PRESCRIPTION OPIATE :
    LITIGATION
7
                        : CASE NO.
    THIS DOCUMENT : 1:17-MD-2804
    RELATES TO ALL CASES:
                         : Hon. Dan A.
9
                           Polster
10
             Friday, January 4, 2019
11
12
    HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
             CONFIDENTIALITY REVIEW
13
14
                 Videotaped deposition of
    DEBRA CHASE, taken pursuant to notice,
15
    was held at the law offices of Morgan
    Lewis & Bockius, 1111 Pennsylvania
16
    Avenue, NW Washington, DC 20004,
    beginning at 10:17 a.m., on the above
17
    date, before Amanda Dee Maslynsky-Miller,
    a Certified Realtime Reporter.
18
19
20
21
22
            GOLKOW LITIGATION SERVICES
        877.370.3377 ph | 917.591.5672 fax
23
                deps@golkow.com
24
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2	EARANCES:	.	INDEX
3	BARON & BUDD, P.C. BV: WILLIAM POWERS F	SOURE	3
4	BARON & BUDD, P.C. BY: WILLIAM POWERS, E EMMA KABOLL, PARA 600 New Hampshire Avenue	LEGAL '	Testimony of: DEBRA CHASE
	Sinie Iua	!	
6	Washington, DC 20037 Wpowers@baronbudd.com Representing the Plaintiffs		By Mr. Powers 7
/			7
0	MORGAN, LEWIS & BOCK BY: JOHN P LAVELLE, JR	, ESQUIRE	EXHIBITS
9	MORGAN, LEWIS & BOCK BY: JOHN P LAVELLE, JR 1701 Market Street Philadelphia, Pennsylvania 19 (215) 963-4824 John.lavelle@morganlewis.co	0103	0
0	(215) 963-4824 John.lavelle@morganlewis.co	om 12	NO. DESCRIPTION PAGE RiteAid-Chase
_	- and -	1:	Exhibit-1 Rite_Aid_OMDL_0016495-498 40
2	BY: JOHN M. MALOY. ESO		RiteAid-Chase
3	101 Park Avenue New York, New York 10178	14	Exhibit-2 Rite_Aid_OMDL_0016297-329 85 RiteAid-Chase
4	(212) 309-6682 John malov@morganlewis co	m	Exhibit-3 Rite Aid OMDL 0012503-505 10
5	BY: JOHN M. MALOY, ESO 101 Park Avenue New York, New York 10178 (212) 309-6682 John.maloy@morganlewis.co Representing the Defendant, Rite Aid Corporation	11	
7		+	⁷ Exhibit-4 Rite Aid OMDL 0049994-50031 1
8	COVINGTON & BURLING BY: ALISON DICURCIO, L. One CityCenter 850 Tenth Street, NW Washington, DC 20001	$\stackrel{\text{LLP}}{\sim}$	RiteAid-Chase Exhibit-5 Rite Aid OMDL 0016955-956 11
9	One CityCenter	AW CLERK	9 – – –
0	Washington, DC 20001	20	RiteAid-Chase Exhibit-6 Rite Aid OMDL 0003641 129
1	(202) 662-6000 Adicurcio@cov.com	23	¹ RiteAid-Chase — — —
1	(202) 662-6000 Adicurcio@cov.com Representing the Defendant, McKesson Corporation	22	Exhibit-7 Rite_Aid_OMDL_0014379-452 14
3	1	23	
4		Page 3	Page
1 APP	EARANCES: (Continued)		1 age
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3	TELEPHONE/LIVESTREAM:		DEPOSITION SUPPORT INDEX
3 4 1	ARNOLD & PORTER KAYE SO BY: ZENO HOUSTON, ESQUII	CHOLER LLP	
3 4	ARNOLD & PORTER KAYE SC BY: ZENO HOUSTON, ESQUII 250 West 55th Street	CHOLER LLP	Direction to Witness Not to Answer
3 4 1 5 2 1 6 (ARNOLD & PORTER KAYE SC BY: ZENO HOUSTON, ESQUII 250 West 55th Street New York, New York 10019 (212) 836-8000	CHOLER LLP	Direction to Witness Not to Answer Page Line Page Line
3 4 5 6 (7	ARNOLD & PORTER KAYE SOBY: ZENO HOUSTON, ESQUII 250 West 55th Street New York, New York 10019 212) 836-8000 Zeno houston@arnoldporter.com Representing the Defendant.	CHOLER LLP	Direction to Witness Not to Answer Page Line Page Line None
3 4 5 6 7 1 8	ARNOLD & PORTER KAYE SC BY: ZENO HOUSTON, ESQUII 250 West 55th Street New York, New York 10019 212) 836-8000 Zeno houston@arnoldporter.com	CHOLER LLP	Direction to Witness Not to Answer Page Line Page Line None
3 4 1 5 6 7 1 8 8 9	ARNOLD & PORTER KAYE SOBY: ZENO HOUSTON, ESQUII 250 West 55th Street New York, New York 10019 (212) 836-8000 Zeno houston@arnoldporter.com Representing the Defendant, Endo Pharmaceuticals, Endo Heal and Par Pharmaceuticals	CHOLER LLP RE !	Direction to Witness Not to Answer Page Line Page Line None
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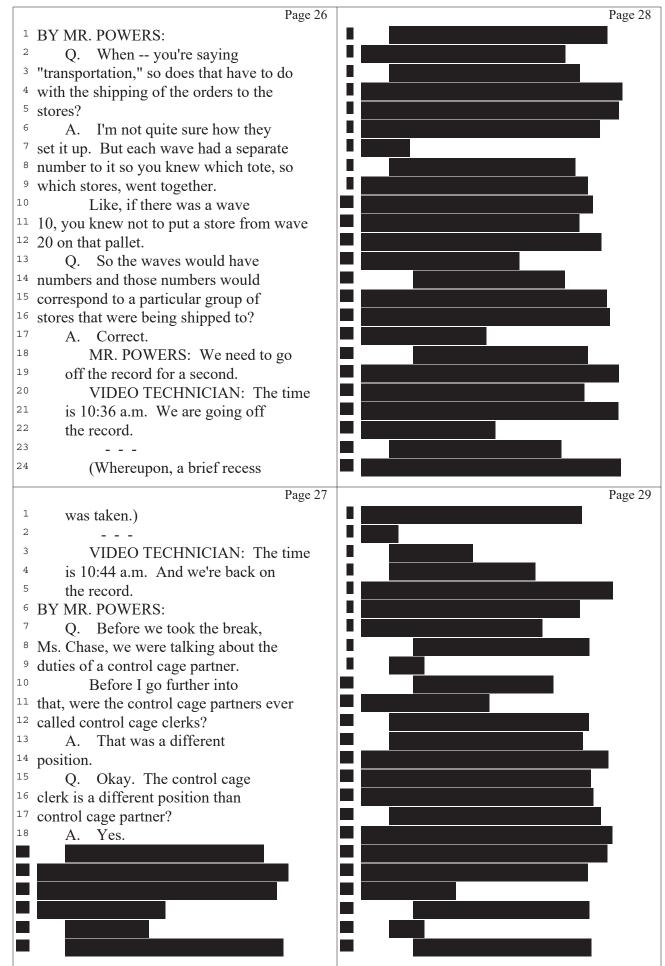
1	Page 6		age 8
1	1 age 0	¹ A. Yes. Debra Ann Chase.	age o
2	(It is because at involute down d		
3	(It is hereby stipulated and	Q. Can you spen it, picase:	Е
4	agreed by and among counsel that	II. DEDKI, II IV IV, CII II S	E.
5	sealing, filing and certification	Q. This we've got a couple of	
6	are waived; and that all	people listening on the phone and in the	
7	objections, except as to the form	6 room, so I'd ask you to just keep your 7 voice up, so everyone can hear	
8	of the question, will be reserved	voice up, so everyone can near.	
9	until the time of trial.)	is that all right.	
10	VIDEO TECHNICIAN. Wasan		
11	VIDEO TECHNICIAN: We are	Q. Tilla tilat your allower	
12	now on the record. My name is	there reads me mits one of my farmer	
13	Daniel Holmstock. I'm the	mon actions.	
14	videographer for Golkow Litigation	Decause we do have a court	
15	Services. Today's date is January	14 reporter taking down the testimony here	
	4th, 2019. The time on the video	15 today, I just ask that all of your	
16	screen is 10:17 a.m.	answers that you give are verbal answers	,
	This video deposition is	a yes of no, something like that, as	
18	being held at the law offices of	opposed to nods of the head, uh-huhs,	
19	Morgan Lewis, at 1111 Pennsylvania	uh-uh, things like that.	
	Avenue, Northwest, in Washington,	is that all right.	
21	D.C. in the matter of In Re	A. Okay.	
22	National Prescription Opiate	Q. If, for any reason, you	
23	Litigation.	23 don't understand a question I'm asking	
24	The case is pending before	24 today or require any sort of	
	Page 7	P	age 9
1			
1	the United States District Court	¹ clarification, explanation of the words	
2	for the Northern District of Ohio,	² I'm using or anything like that, you have	
		· •	
2	for the Northern District of Ohio,	² I'm using or anything like that, you have	
2	for the Northern District of Ohio, Eastern Division. The deponent is	 I'm using or anything like that, you have to tell me and we'll get that matter 	
3 4	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. 	
2 3 4 5	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? 	
2 3 4 5	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. 	
2 3 4 5 6 7	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. 	
2 3 4 5 6 7 8	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and 	
2 3 4 5 6 7 8	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. 	
2 3 4 5 6 7 8 9	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering 	
2 3 4 5 6 7 8 9 10	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows:	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that 	
2 3 4 5 6 7 8 9 10 11 12 13 14	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and	 I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability 	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION SYMR. POWERS: Q. Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this litigation.	I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and	
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION EXAMINATION OR Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this litigation. Before we get going, can you please state your full name and spell it	I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and you're under oath here just as you would be in a courtroom at trial? A. Yes. Q. And because you're under	
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	for the Northern District of Ohio, Eastern Division. The deponent is Debra Chase. Counsel will be noted on the stenographic record for appearances. The court reporter is Amanda Miller, who will now administer the oath. DEBRA CHASE, after having been duly sworn, was examined and testified as follows: EXAMINATION OGO MR. POWERS: Q. Good morning, Ms. Chase. A. Good morning. Q. My name is Will Powers, and I represent the plaintiffs in this litigation. Before we get going, can you	I'm using or anything like that, you have to tell me and we'll get that matter resolved before you answer the question. Is that okay? A. Yes. Q. So, then, if you answer a question, I'm going to go ahead and assume that you understand it. Is that okay? A. Yes. Q. Are you currently suffering from any medical disease or illness that in any way interferes with your ability to answer truthfully and completely my questions here today? A. No. Q. Do you understand that the court reporter has sworn you in and you're under oath here just as you would be in a courtroom at trial? A. Yes.	

2 intentionally misleading answer, you may 2 be subject to criminal or civil 3 penalties.	Highly Confidential - Subject to	o Further Confidentiality Review
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7. Q. Did you ever receive a 12 Stationed at Aberdeen Proving Ground.		Tilla arter that, I was
	2. Did you ever receive a	Stationed at Aberdeen Proving Ground.

Page 14 Page 16 Yes. ¹ And then I went to Augsburg, Germany, and A. ² back to Aberdeen Proving Ground. And my Q. What were the part-time jobs ³ last station was in Kaiserslautern, ³ you had in addition to your full-time job ⁴ at Northeast Foods during the time period ⁴ Germany. ⁵ of '92 to '98? Q. And you mentioned that you ⁶ got some education while you were in the A. I worked for Rite Aid Army. pharmacy, the store, for a brief period. 8 And what else? What was the education you I worked for Riley Mortgage got while you were in the Army? A. All the education I got was Company part time in Columbia, Maryland as well. 11 ¹¹ pertaining to the particular job that I ¹² had. Q. The Rite Aid store you 13 worked at part time before 1998, what Q. What was the particular job you had? were you doing at the store? A. It was called personnel A. I was a cashier. Q. Was cashier your only job 16 ¹⁶ information systems. 17 you had, before joining Rite Aid full Q. And what -- can you describe ¹⁸ what personnel information systems was? time in '98, at Rite Aid? A. Yes. 19 A. It actually entailed quite a 20 ²⁰ few things. Mainly, like, data entry Q. When you first started ²¹ information. working at Rite Aid in 1998, what was the position that you had? Q. Then you said you left the 23 military in 1992, right? A. When I first started, I was A. Correct. ²⁴ hired as the order fulfillment partner. Page 15 Page 17 Q. Where -- what did you do Q. And where were you working after you left the military in 1992? ² at that time as an order fulfillment A. So forgive me, that kind of partner? goes back to the education. A. In the Rx area, pharmacy I did go to school again and area. 6 took a couple of classes at Harford Q. When you say "the Rx area," ⁷ are you referring to a physical area or a ⁷ Community. topic area? But then I was employed by ⁹ Northeast Foods in Baltimore. MR. LAVELLE: Object to 10 Q. And what did you do for 10 form. 11 THE WITNESS: I'm sorry? ¹¹ Northeast Foods? 12 A. I was a payroll clerk and BY MR. POWERS: data entry clerk. 13 Q. You said that you worked in Q. When did you first start the Rx area. 15 15 working at Rite Aid? Are you talking about a physical area or, like, a topic area? 16 A. In 1998. 17 17 Q. Between '92 and '98, when A. It was -you first started working at Rite Aid, 18 MR. LAVELLE: Object to 19 did you work anywhere else besides 19 form. ²⁰ Northeast Foods? 20 THE WITNESS: It was the 21 21 A. Not full time. I had department. part-time jobs. BY MR. POWERS: Q. Was your job with Northeast Q. Where were you physically ²⁴ Foods a full-time job? ²⁴ located when you started working at Rite

	2 10	ا ر	-
	Page 18		Page 20
	Aid in '98 as an order fulfillment		order fulfillment partner, yes.
1 -	partner?	2	Q. When you started in 1998,
3	A. In the Rx department.	3	ara year may early earlier erests electates
4	Q. But was that in Maryland?	4	order fulfillment partner?
5 \	Was that	5	A. At that time, no.
6	A. I'm sorry.	6	Q. So you testified that your
7	Yes, in	7	mst responsionates were working with
8	MR. LAVELLE: Object to	8	the A-frames.
9	form.	9	Did you ever switch
10	Please let the attorney		responsibilities or change
11	finish his question before you		responsibilities during your after you
12	start answering.	12	started in 1998 at Rite Aid?
13	THE WITNESS: I'm sorry.	13	MR. LAVELLE: Object to
14	Could you repeat that,	14	form.
15	please?	15	THE WITNESS: Yes, I did.
16 E	BY MR. POWERS:	16	BY MR. POWERS:
17	Q. Sure.	17	Q. When was that? When was the
18	In 1998 when you started	18	first time that happened?
19 V	vorking at Rite Aid full time, where,	19	A. Approximately six months to
²⁰ p	physically, was the office you were	20	a year, I switched to another position.
21 V	vorking at?	21	Q. So that would have been some
22	A. That was in Aberdeen	22	time in 1999, probably, then?
23 F	Perryman, Maryland.	23	A. Approximately. I'm not
24	Q. And is that the distribution	24	exactly sure.
	Page 19		Page 21
1 c	Page 19	1	O. And what was the position
	eenter Rite Aid has in Perryman,	1 2	Q. And what was the position
	eenter Rite Aid has in Perryman, Maryland?		Q. And what was the position you switched into?
2 N	eenter Rite Aid has in Perryman, Maryland? A. Yes.	2	Q. And what was the position you switched into? A. At that time, I was moved
2 N 3 4	venter Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job	2	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage.
2 N 3 4 5 r	eenter Rite Aid has in Perryman, Maryland? A. Yes. Q. What were your job esponsibilities as an order fulfillment	2 3 4 5	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control
2 N 3 4 5 r	A. Yes. Q. What were your job esponsibilities as an order fulfillment partner in starting in 1998?	2 3 4 5	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage?
2 N 3 4 5 r 6 p 7	A. Yes. Q. What were your job esponsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx	2 3 4 5	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the
2 M 3 4 5 r 6 p 7 8 c	A. Yes. Q. What were your job esponsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for	2 3 4 5 6 7	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held.
2 M 3 4 5 r 6 p 7 8 d	A. Yes. Q. What were your job responsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for running the A-frames.	2 3 4 5 6 7 8	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held. Q. And that's also at the
2 M 3 4 5 r 6 p 7 8 cc 9 r	A. Yes. Q. What were your job esponsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for unning the A-frames. Q. What are the A-frames?	2 3 4 5 6 7 8	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held.
2 M 3 4 5 r 6 p 7 8 d 9 r 10	A. Yes. Q. What were your job esponsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for unning the A-frames. Q. What are the A-frames? A. A-frames was a machine that	2 3 4 5 6 7 8 9	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held. Q. And that's also at the Perryman distribution center in Aberdeen? A. Yes.
2 M 3 4 5 r 6 p 7 8 c 9 r 10 11 12 v	A. Yes. Q. What were your job esponsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for unning the A-frames. Q. What are the A-frames? A. A-frames was a machine that was set up to dispense to dispense the	2 3 4 5 6 7 8 9 10	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held. Q. And that's also at the Perryman distribution center in Aberdeen? A. Yes. Q. Did your title change when
2 M 3 4 5 r 6 p 7 8 C 9 r 10 11 12 V	A. Yes. Q. What were your job esponsibilities as an order fulfillment bartner in starting in 1998? A. I started off in the Rx department, and I was responsible for unning the A-frames. Q. What are the A-frames? A. A-frames was a machine that was set up to dispense to dispense the product into the totes for the stores.	2 3 4 5 6 7 8 9 10 11	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held. Q. And that's also at the Perryman distribution center in Aberdeen? A. Yes. Q. Did your title change when you were moved into the Rx control cage?
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2 M 3 4 5 r 6 F 7 8 c 9 r 10 11 12 V 13 F 14	A. Yes. Q. What were your job esponsibilities as an order fulfillment partner in starting in 1998? A. I started off in the Rx department, and I was responsible for unning the A-frames. Q. What are the A-frames? A. A-frames was a machine that was set up to dispense to dispense the product into the totes for the stores. Q. How long were you an order fulfillment partner?	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. And what was the position you switched into? A. At that time, I was moved into the Rx control cage. Q. And what is the Rx control cage? A. The Rx control cage is the area where controlled drugs were held. Q. And that's also at the Perryman distribution center in Aberdeen? A. Yes. Q. Did your title change when you were moved into the Rx control cage? A. The added title was control cage partner.
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Page 22 Page 24 ¹ consisted of a paperwork person or a ¹ okay. picker or a receiver or a replenisher. Any other kind of reports Q. Anything else besides a ³ that the paperwork control cage partner ⁴ paperwork person, picker, receiver or ⁴ ran besides the pick list? ⁵ replenisher? MR. LAVELLE: Object to A. Not as an actual control form. cage associate, no. THE WITNESS: Yes, they did. Q. And just so we're clear, BY MR. POWERS: ⁹ when you -- when we talk about the Q. What were those reports? 10 control cage, is that the area within the 10 A. They were -- what did we 11 distribution center that the controlled call them? Sorry, right now it just kind ¹² substances are held? of slipped my mind, the actual name of 13 A. Yes. ¹³ it. Q. So you mentioned four 14 Q. Can you describe it? responsibilities of the control cage 15 A. It was a list of the -- all the stores that printed for a wave, what partner. 17 they called a wave. The first one you mentioned was paperwork person. Q. What is a wave? The wave is set up by 19 Can you describe what you 19 mean by that? transportation, and all the stores that 20 A. The paperwork person was would be picked in that one area -- in ²² responsible for recording the tote that one section, shall I say. ²³ numbers and store numbers onto a log for 23 I'm sorry, and going back to 24 the totes that were picked for the 24 the other question you asked me, what was Page 23 Page 25 ¹ stores. ¹ the name of the -- it was actually called ² a tote list. The --Q. Did the log have a name? A. Yes, it has a name. Right Q. So the wave you're talking now it kind of slips my mind. ⁴ about, is that like a wave of shipments Q. Okay. Any other ⁵ that would go out to a particular set of responsibilities of the paperwork person? stores, or is that a wave inside the A. After they log the distribution center itself? 8 ⁸ information onto the sheet, then they MR. LAVELLE: Object to would palletize the totes after they were 9 form. strapped and tied, according to that log. 10 THE WITNESS: I'm sorry, 11 Q. Anything else? 11 could you ask that again? 12 A. And run reports. 12 BY MR. POWERS: Q. What kind of reports did the 13 13 O. Sure. 14 paperwork control cage partner run? You described a wave before 15 The pick list that listed when you were talking about the pick 16 the -- all the drugs that the store was 16 list. 17 supposed to get on that paper. Can you describe what the 18 Q. So the pick list was a list wave means when you say "wave"? 19 of all the drugs that any particular Rite 19 MR. LAVELLE: Object to ²⁰ Aid store was supposed to get in a 20 form. 21 21 shipment? THE WITNESS: Each wave had 22 22 A. On that particular order, the stores set up the way ²³ yes. 23 transportation had them to be 24 24 On that particular order, picked.





5		
		Page 34
5	Q. When were you a	a control cage
6 asso	ciate?	
l _		

- e
- A. The whole time I was there I was considered a control cage associate.
- Q. Is control cage associate ¹⁰ the same thing as control cage partner, 11 then?
- 12 A. Yes.
- 13 Q. When did you become a control cage clerk?
- 15 A. I can't remember the actual 16 date.
- 17 Q. Can you give me an 18 approximate date?
- A. I'm not for sure. I would 19 say within about a year after working there.
- 22 O. So some time before 2000?
 - A. Yes.

23

How long were you a control

- Q. Do you know how long you
- ² were a DEA coordinator for?
 - A. Approximately five years.
 - Q. So you were a DEA
- ⁵ coordinator from about 2002 to about 2007; is that right?
 - A. Yes.
 - Q. And after you stopped being
- the DEA coordinator, what was your position?
- 11 A. I went back to the DEA 12 clerk.
- 13 Q. When you say you went back
- to DEA clerk, were you ever a DEA clerk before?
- 16 A. Yes. I was a DEA clerk
- before I became a coordinator.
- Q. So is control cage clerk the
- same as DEA clerk?
 - A. I'm sorry. Yes, it is.
- Q. I'm just trying to get a
- handle on the different titles.
 - A. Yes, I apologize.
- When we say it, it is sort

Page 35

20

23

- ¹ cage clerk for?
- A. That, I don't remember the ³ exact date either.
- Are you still a control cage Q. 5 clerk?
- I am not.
- 7 Q. What is your current position?
- A. My current position is a control cage associate.
- Q. Did you have any other positions besides control cage associate or control cage clerk?
- A. Yes.

15

20

- Q. What were those positions?
- A. After the control cage 16
- clerk, I became the DEA coordinator.
- 18 Q. Do you know when you became the DEA coordinator? 19
 - A. I'm sorry?
- 21 Q. When did you become the DEA coordinator?
- A. I don't remember the exact ²⁴ dates. Approximately 2002.

¹ of interchangeable.

- Q. So after being DEA
- ³ coordinator, you went back to being a DEA ⁴ clerk.

Page 37

- How long did you remain a
- ⁶ DEA clerk after approximately 2007? A. I can't quite remember. I
- ⁸ believe it was less than a year, because
- they changed the position -- they kind of
- got rid of the position as the clerk.
- Q. Did you transition to a new position at that point when they got rid of the DEA clerk position?
- A. Yes. Then I became the control cage lead.
- Q. And how long were you a 16 control cage lead?
- 18 A. Up until currently -- I'm sorry, excuse me, until 2014.
- Q. And then after 2014, what was your position?
- A. Then I just pretty much ²³ became the DEA associate again, or
- ²⁴ partner.

	ignity contractional babycoc c	<u> </u>	Further Confidentiality Review
	Page 38		Page 40
1	Q. And that is that what you	1	entire time there?
2	referred to earlier as the control cage	2	A. No.
3	associate?	3	Q. When you moved on to the
4	A. Correct.	4	position of DEA coordinator in around
5	Q. Okay. I want to go back to	5	2002, what were your job responsibilities
6	the control cage clerk before you became	6	
	DEA coordinator.	7	
8			A. My main responsibilities were to make sure that the associates in
	What were your job		
9	responsibilities in that position?	1 2	the cage were adhering to different
10	A. If I remember, most of the	1	procedures and policies within the cage
	responsibilities were to monitor the		and to maintain the inventory, and it
12	billing report and different	12	meraded correspondence with BERT agents
13	correspondences with other people within	13	and Board of Finantiae's agents, and other
14	the building, and helping out in the	14	clerical things.
15	control cage with whatever was needed	15	
16	from the other associates, and assisting	16	(Whereupon, Exhibit
17	the DEA clerk with whatever I mean, a	17	RiteAid-Chase Exhibit-1,
18	DEA coordinator with whatever she needed.	18	Rite Aid OMDL 0016495-498, was
19	Q. Who was the DEA coordinator?	19	
20	A. At the time	20	,
21	MR. LAVELLE: Object to	21	MR. POWERS: I'll hand you
22	form.	22	<u> </u>
23	BY MR. POWERS:	23	
24	Q. Yeah. At the time you were	24	
	Q. I can. At the time you were		Rite_Ald_ONDE_0010475. Alld it's
	Page 39		Page 41
1	Page 39 a control cage clerk, before becoming a	1	
		1 2	an e-mail with the included
	a control cage clerk, before becoming a		an e-mail with the included attachments.
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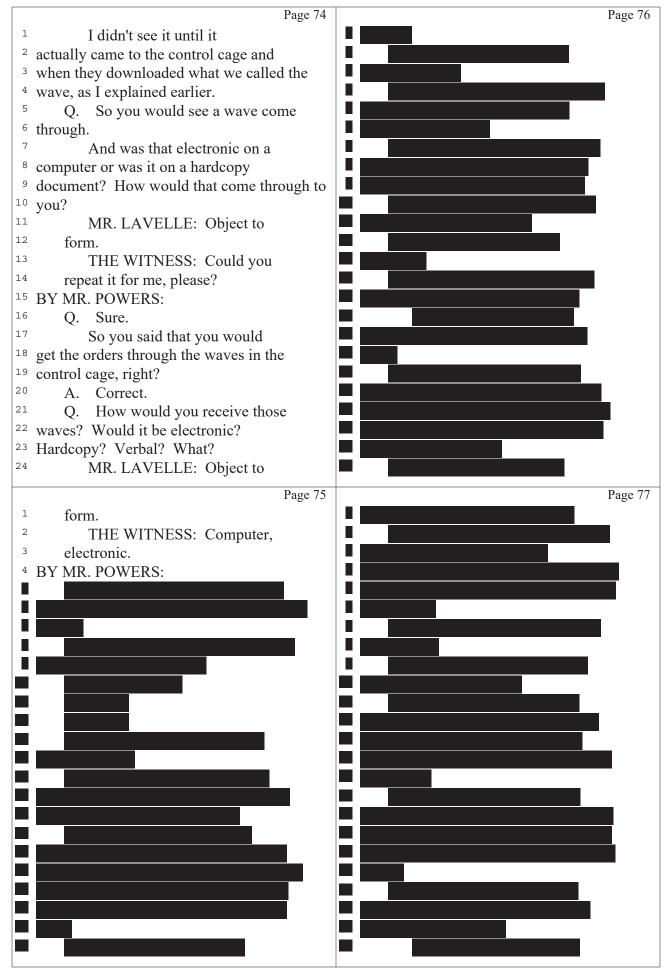




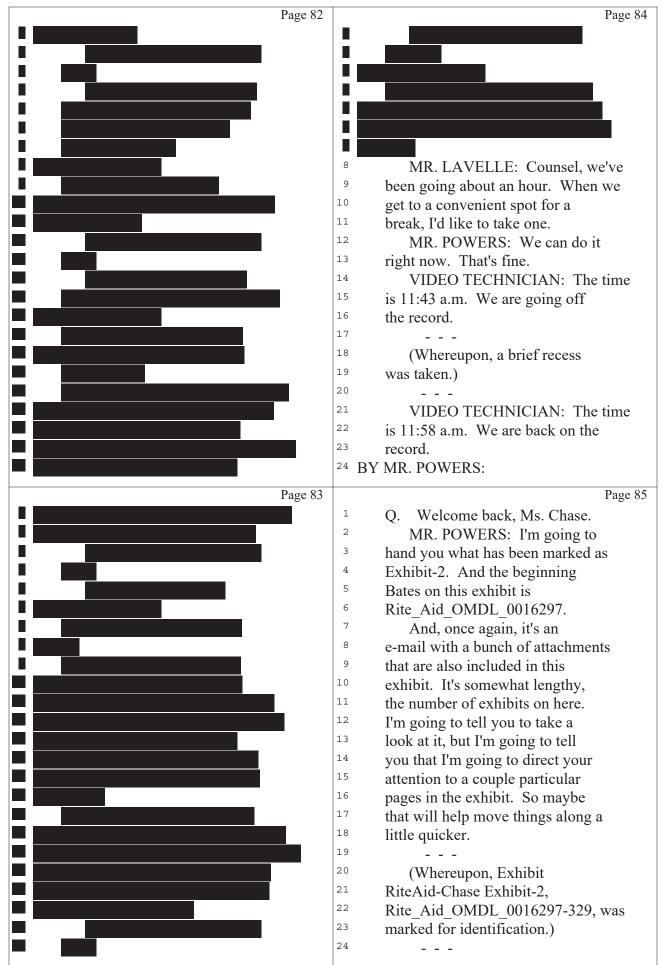


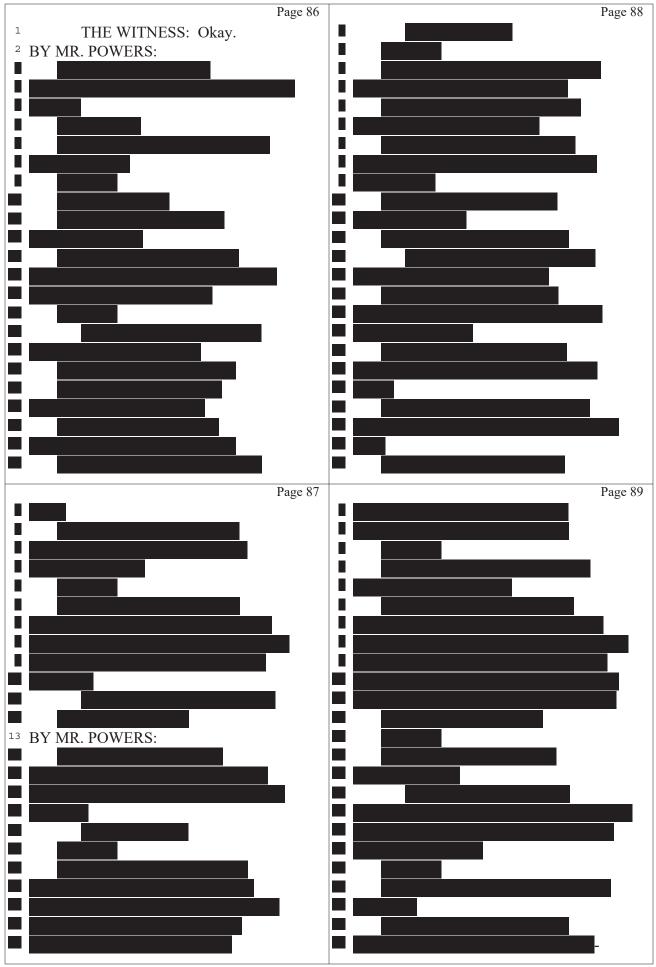


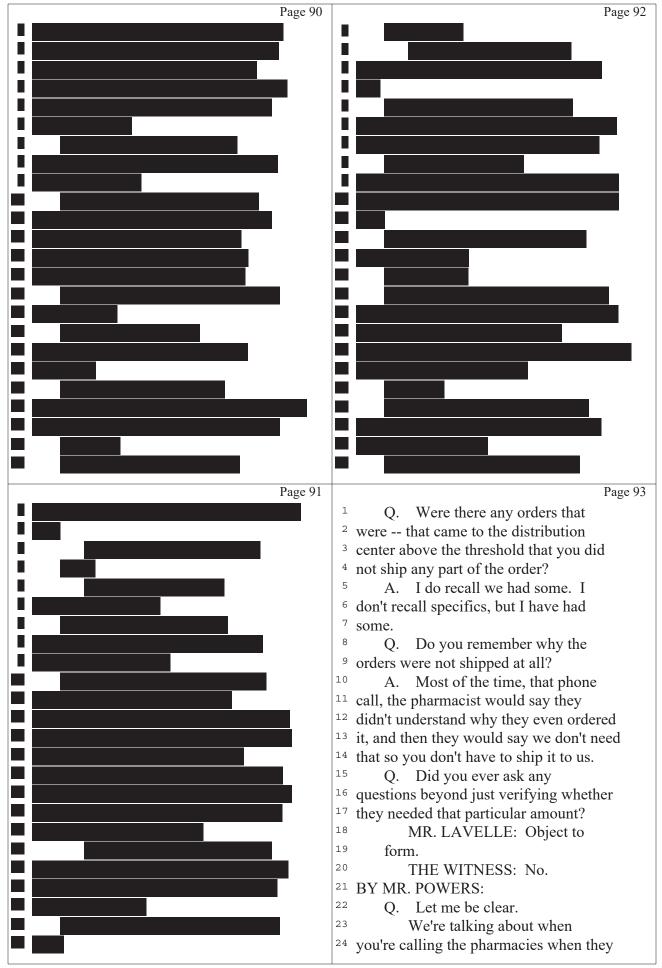
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Τ.	Page 70	1	Page 7
2	MR. LAVELLE: Counsel, are	2	should be.
	you finished with Chase-1?		Q. When you say "we," in an
3	MR. POWERS: Yes.		order that we have a question about, do
4	MR. LAVELLE: I'll give it	4	you mean rate ma.
5	to the court reporter. She needs	5	A. Yes. In the context of who
6	to keep all the exhibits.	6	was working with me.
7	Thank you.	7	Q. And you said that it's an
8	BY MR. POWERS:	8	order that is possibly not what it should
9	Q. Does Rite Aid have an	9	be.
10	obligation to prevent diversion?	10	What do you mean by that?
11	A. Yes.	11	A. As in if we thought
12	MR. LAVELLE: Object to	12	
13	form.	13	
14	BY MR. POWERS:	14	going to the pharmacist, or if we thought
15	Q. Why does Rite Aid have an	15	
16	obligation to prevent diversion?	16	Q. We talked a little bit
17	MR. LAVELLE: Object to	17	
18	form.		worked at the DC, and I want to just get
19	THE WITNESS: Could you		clarity on a couple of points.
20	repeat that? I'm sorry.	20	The Rite Aid distribution
	BY MR. POWERS:	21	centers only distributes to Rite Aid
22		22	stores, correct?
	Q. Why does Rite Aid have an	23	A. Yes.
24	obligation to prevent diversion?	24	
	MR. LAVELLE: Object to		Q. And the Rite Aid
	Page 71		Page 7
1	form.	1	distribution centers only distributed
2	THE WITNESS: As a	2	controlled substances up until 2014,
3	distributor, they would have an	3	right?
4	obligation to make sure their	4	A. Yes.
5	items aren't going other than	5	Q. How often would orders for
6	where they're supposed to go.	6	controlled substances be received at the
7	BY MR. POWERS:	7	distribution center?
8	Q. Any other reason besides by	8	A. Like
9	virtue of being a distributor?	9	Q. Like, would an order come in
10	MR. LAVELLE: Same	10	daily? Weekly? Every hour? How did
11	objection.	11	that work?
12	THE WITNESS: Not that I can	12	MR. LAVELLE: Object to
13	necessarily think of right now.	13	form.
14	BY MR. POWERS:	14	THE WITNESS: Oh, I'm sorry.
	Q. Are you familiar with the	15	The orders came they came
15	concept are you familiar with the	16	through daily.
	concept of a suspicious order in the	17	BY MR. POWERS:
16		1	
16 17		18	O And once the orders came
16 17 18	context of controlled substance	18 19	Q. And once the orders came
16 17 18	context of controlled substance distribution?	19	through, what happened next?
16 17 18 19	context of controlled substance distribution? A. Yes.	19	through, what happened next? A. I was not in a position
16 17 18 19 20	context of controlled substance distribution? A. Yes. Q. What does that mean to you?	19 20 21	through, what happened next? A. I was not in a position to how can I put it? The way they
17 18 19 20 21 22	context of controlled substance distribution? A. Yes. Q. What does that mean to you? A. To me, that means that	19 20 21 22	through, what happened next? A. I was not in a position to how can I put it? The way they came through the building, I didn't have
16 17 18 19 20 21 22	context of controlled substance distribution? A. Yes. Q. What does that mean to you?	19 20 21 22 23	through, what happened next? A. I was not in a position to how can I put it? The way they came through the building, I didn't have

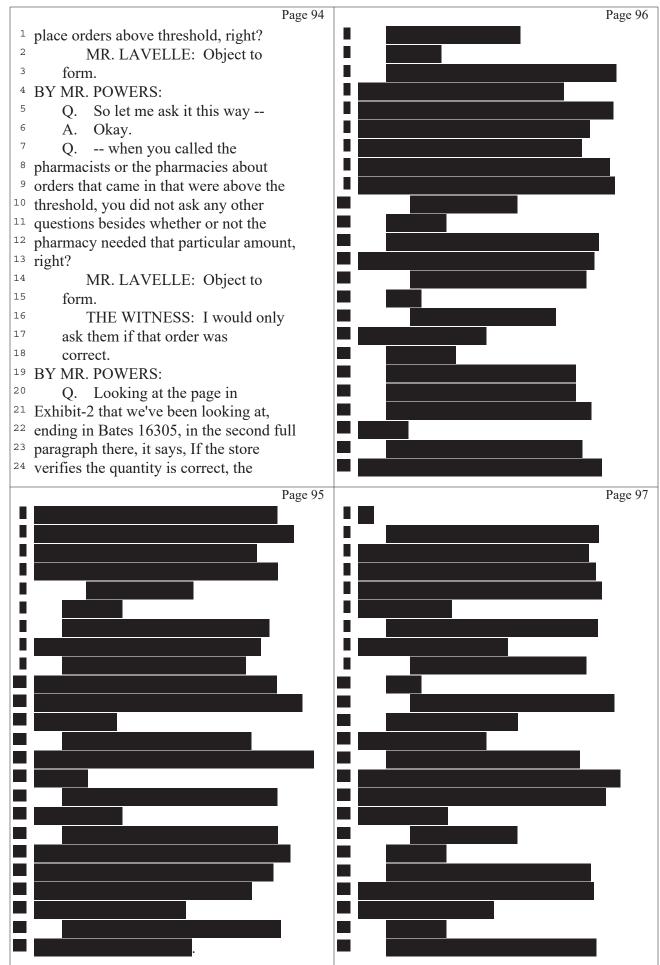




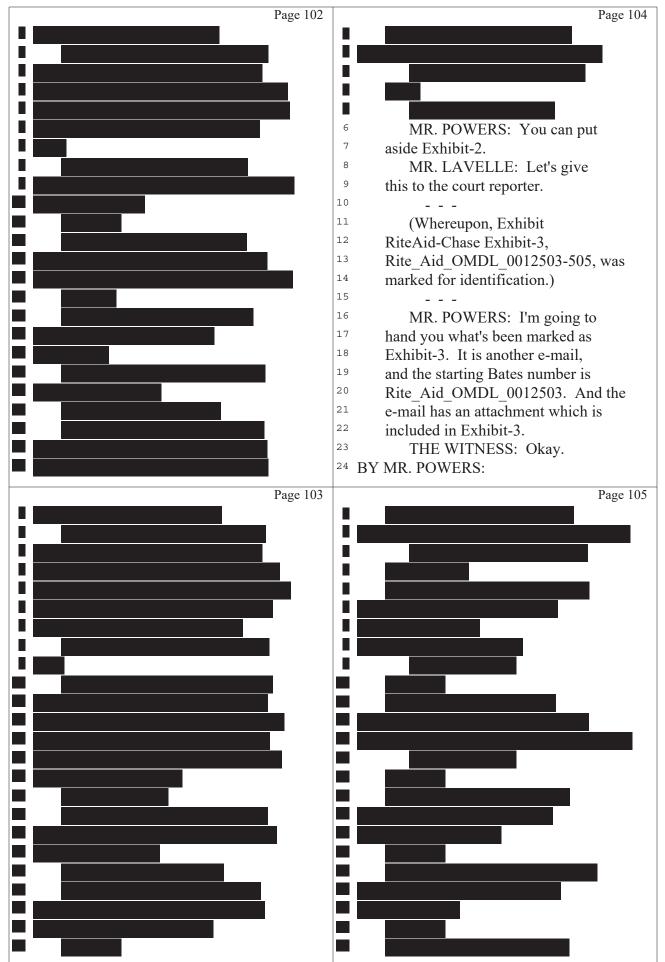




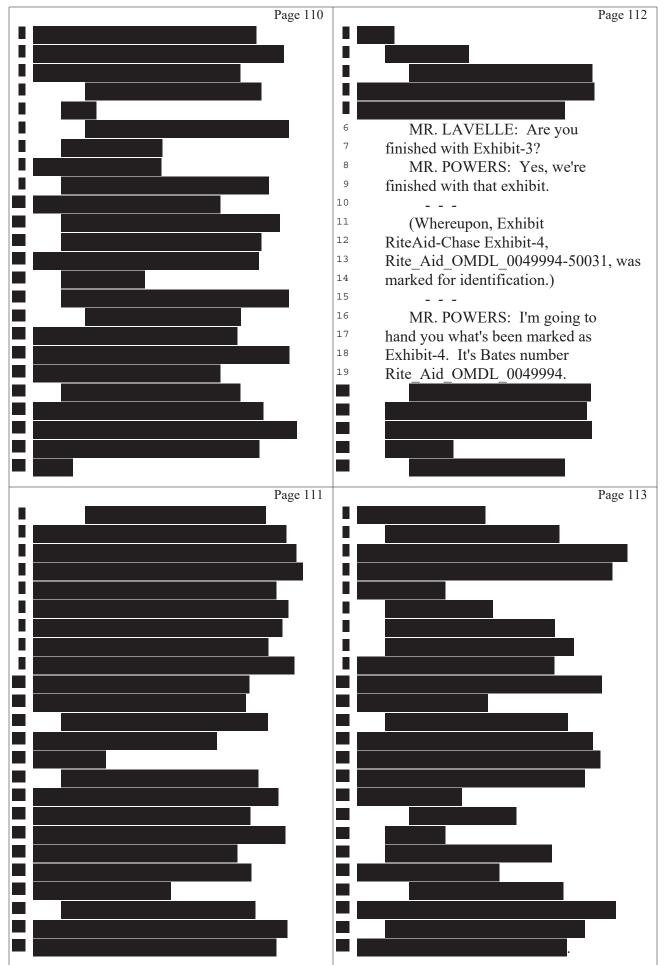


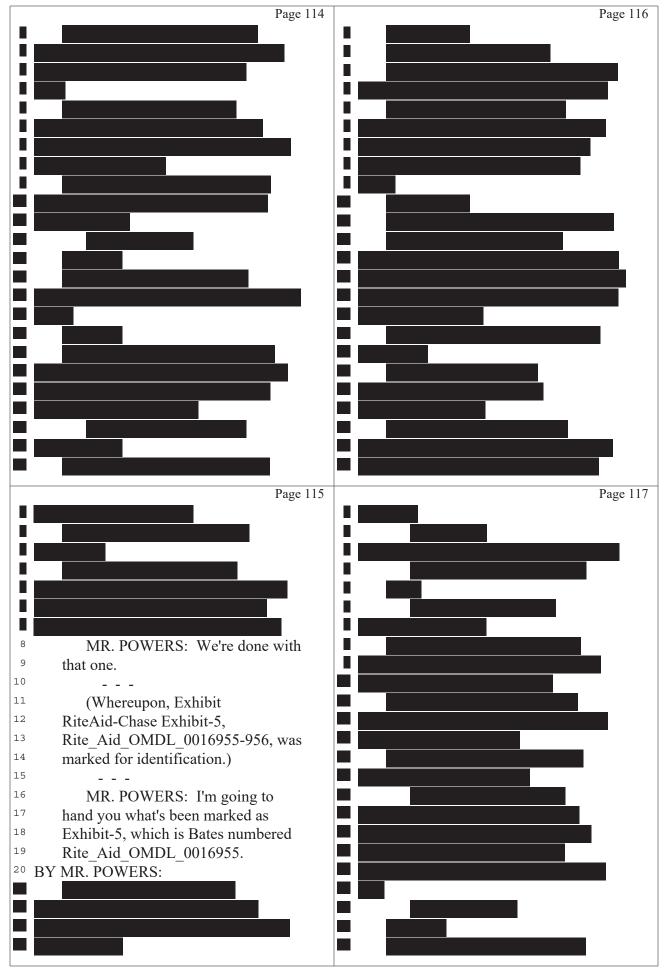












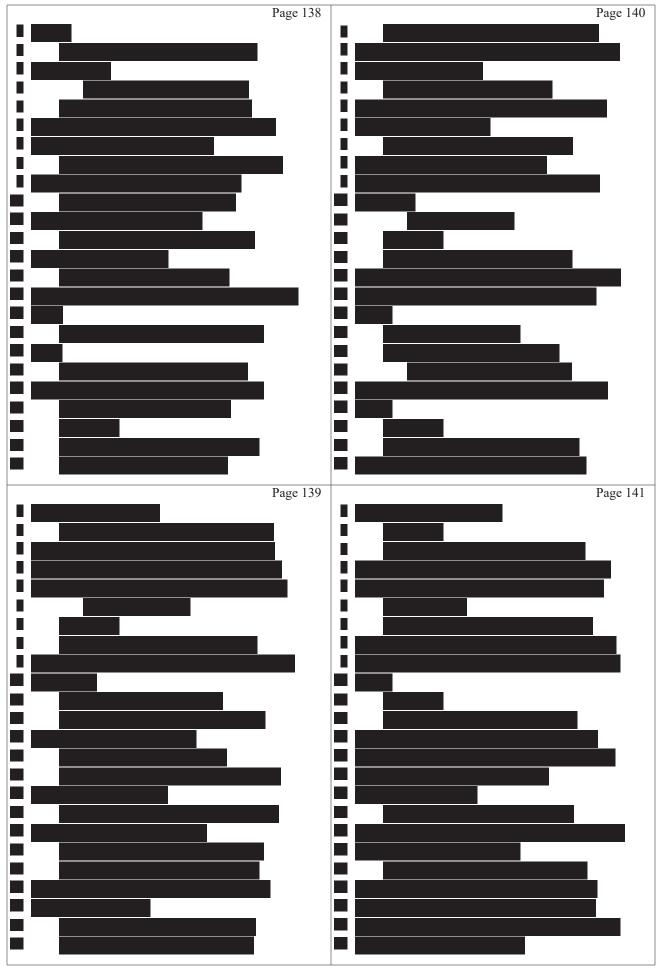




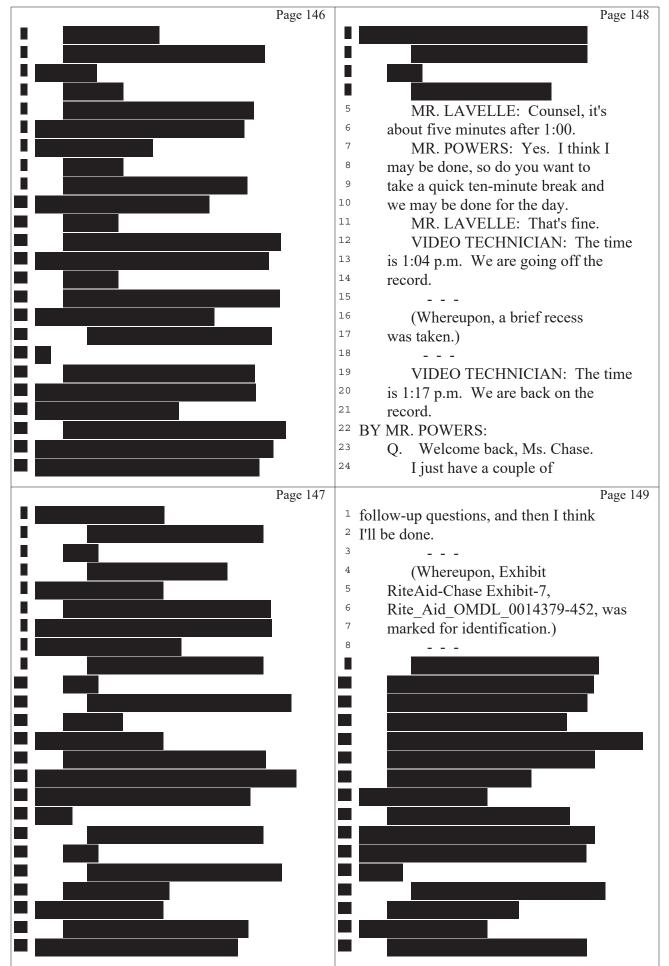




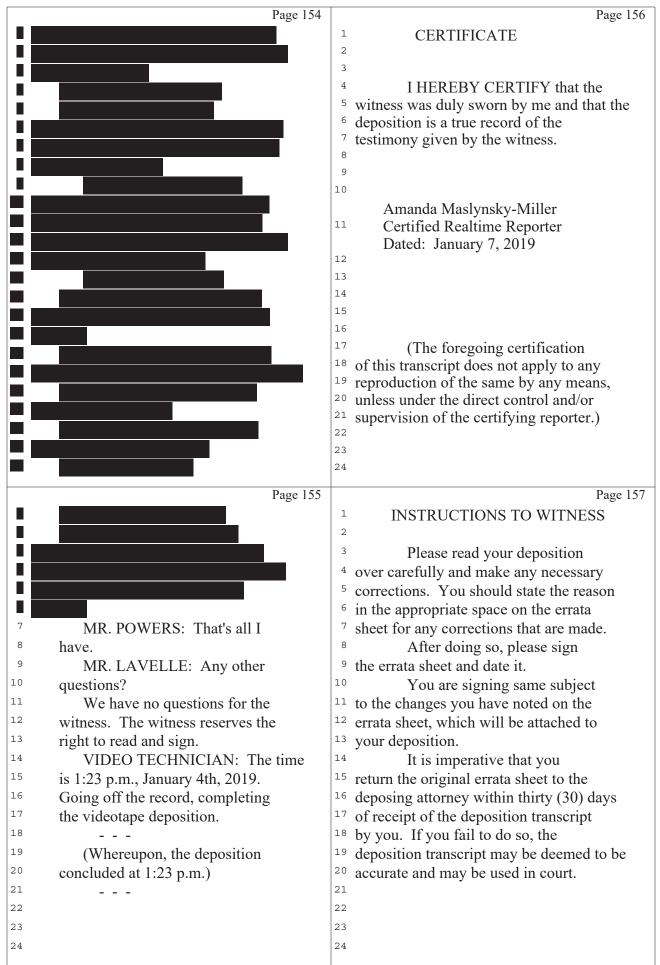












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1	1 LAWYER'S NOTES
ERRATA	² PAGE LINE
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³ PAGE LINE CHANGE/REASON	4
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ACKNOWLEDGMENT OF DEPONENT I,, do hereby certify that I have read the foregoing pages, 1 - 155, and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.	
DEBRA CHASE DATE	
9 10	
Subscribed and sworn	
to before me this day of, 20	
12	
My commission expires:	
Notary Public	
15	
16 17	
18	
19 20	
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23 24	